

Exhibit B

Stern, Jonathan M.

From: Trey Shaw <Trey.Shaw@wnco.com>
Sent: Tuesday, April 30, 2013 3:08 PM
To: Deborah Edwards; Ed Schneider; Ted Thornton; Elise May
Cc: Elizabeth Behrens
Subject: Flight #392 - Customers Denied Boarding - Shah, Chirag - GL7SLE
Attachments: Ava Alley SR 213660741679.pdf; IAD report SR213660741679.pdf; Regina Pashall SR 213660741679.pdf; Shannon Ramos SR 213660741679.pdf

Sensitivity: Confidential

Follow Up Flag: Follow up

Flag Status: Flagged

Good Afternoon

I recently received the below correspondence from our Customer regarding being removed from an aircraft and being denied boarding. I have received reports from the three Flight Attendants onboard and the IAD Gate Agent (attached) and would greatly appreciate feedback from each of you on how you feel this situation was handled. I appreciate your time and look forward to hearing from each of you soon.

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I called into SW CSR today and explained the whole event and Susan - the rep on phone has opened a ticket 213659802352 to be escalated up the chain and get the flight report etc.

I am contacting you to ensure that you have this in writing from me as well. Here's what happened and is exactly what I told the TSA folks as well.

I boarded the flight to DEN around 5.50pm from IAD and found a seat in first row window towards the right side of plane. I put my laptop in the bin above and did not have space for my winter jacket which I kept in my lap. I had brought a Potbelly sandwich and Cream soda bottle as well, which I ate while the plane was still at gate. As the plane started taxing I was having causal conversation with gentleman right next to me. I am very fond of planes and airports so I pretty much look out the window like a little kid and keep watching the line we had in front of us as we were taxing. Though I did notice that the flt attendant with blonde short hair and wearing glasses was looking towards me. I kept looking back and forth outside the window and back to her as she was sort of continuing to stare at me for no reason. Anyways, the Flt attendant did her PA and we were moving slowly. I made sure my belt was on. We came up right near the runway and I noticed the plane took a reverse turn instead of going to the runway. The pilot came on the PA and stated they were having couple of passenger issues and were taxing back to the gate.

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scene anywhere. I asked the police to speak to the person sitting right next to me, though they stated that I will not be allowed to fly.

So please contact me and I want to escalate this higher up the chain.

Trey Shaw

Southwest Airlines

Customer Relations & Rapid Rewards

214-932-0332 x2069



 Please consider the environment before printing this email

Stern, Jonathan M.

From: Elizabeth Behrens <Elizabeth.Behrens@wnco.com>
Sent: Tuesday, April 30, 2013 3:22 PM
To: Trey Shaw
Subject: RE: Flight #392 - Customers Denied Boarding - Shah, Chirag - GL7SLE

Sensitivity: Confidential

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Perfect...thanks!

I am interested in what their response is going to be. ☺

From: Trey Shaw
Sent: Tuesday, April 30, 2013 2:08 PM
To: Deborah Edwards; Ed Schneider; Ted Thornton; Elise May
Cc: Elizabeth Behrens
Subject: Flight #392 - Customers Denied Boarding - Shah, Chirag - GL7SLE

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Stern, Jonathan M.

From: Elise May <Elise.May@wnco.com>
Sent: Tuesday, April 30, 2013 3:22 PM
To: Trey Shaw; Deborah Edwards; Ed Schneider; Ted Thornton
Cc: Elizabeth Behrens
Subject: RE: Flight #392 - Customers Denied Boarding - Shah, Chirag - GL7SLE

Sensitivity: Confidential

Follow Up Flag: Follow up
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Hi Trey,

I will allow our PHX Base Leaders a chance to read the reports and share their thoughts. The FAs did exactly what they are trained...they contacted the Pilots with their concerns. It was the Captain's call to return to the gate.

I would be very careful with the response to this pax. We don't want this to turn into a discrimination issue. You may even want legal to take a look before you send anything out. ☺

Thanks,
Elise

Elise May
Southwest Airlines
Assistant Manager Inflight Safety
214-792-3349
Elise.May@wnco.com



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214-932-0332 x2069



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Stern, Jonathan M.

From: Ted Thornton <Ted.Thornton@wnco.com>
Sent: Friday, May 03, 2013 1:32 PM
To: Trey Shaw
Cc: Elizabeth Behrens; Deborah Edwards; Ed Schneider
Subject: FW: Flight #392 - Customers Denied Boarding - Shah, Chirag - GL7SLE
Attachments: Ava Alley SR 213660741679.pdf; IAD report SR213660741679.pdf; Regina Pashall SR 213660741679.pdf; Shannon Ramos SR 213660741679.pdf

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Hello Trey,

Thank you for reaching out to us to respond in this situation. I do agree with Elise May stating Flight Attendants Regina and Shannon acted appropriately in this situation as they were displaying their Crew Resource Management (CRM) as they are trained to do. It's difficult to say whether or not they over-reacted because they both witnessed something that did not set well. As I re-read their Irregularity Reports, the common thread in both is that they each noticed the peculiar behaviors of the individuals even before they discussed amongst each other their observations. When Regina and Shannon discussed their observations, their CRM kicked in and the decision to notify the flight deck was made. Please let me know if you have any other questions. Thank you.

Ted.Thornton@wnco.com
PHX Assistant Base Manager
(602)286-3348
SDN 8-749-3348
www.southwest.com



From: Trey Shaw
Sent: Tuesday, April 30, 2013 12:08 PM
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214-932-0332 x2069



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Stern, Jonathan M.

From: Elizabeth Behrens
Sent: Thursday, May 16, 2013 12:35 PM
To: Mary Mortensen
Subject: CR SR 213660741679--Pax Chirag Shah--Due ***ASAP***
Attachments: 213660741679--Shah denied boarding due to strange behavior discrim.docx; A FA # 392.pdf; B FA #392.pdf; C FA #392.pdf; IAD SOPI.pdf

Follow Up Flag: Follow up
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As a followup to our conversation, here are the related documents and my response draft to send over for review. I used verbiage from a response that Donna Sue did to a similar situation that our Legal Team reviewed. FYI—the Customer traveled on a flight the next morning.

Before responding, I followed up with Elise May—Assistant Manager Inflight Safety—who said, “The FAs did exactly what they are trained...they contacted the Pilots with their concerns. It was the Captain’s call to return to the gate.”

I appreciate your help!
EB

Stern, Jonathan M.

From: Mary Mortensen
Sent: Thursday, May 16, 2013 3:02 PM
To: Elizabeth Behrens
Subject: FW: FW: CR SR 213660741679--Pax Chirag Shah--Due ***ASAP***
Attachments: 213660741679--Shah denied boarding due to strange behavior discrim.docx

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Senior Supervisor
Customer Claims Administration
Southwest Airlines Co.
P O Box 36611
Dallas, TX 75235
214-792-4387
214-932-1333 (f)
www.cca@wnco.com

-----Original Message-----

From: William.Ranieri@usaig.com [<mailto:William.Ranieri@usaig.com>]
Sent: Thursday, May 16, 2013 1:58 PM
To: Mary Mortensen
Cc: sherry.ortiz@usaig.com
Subject: Re: FW: CR SR 213660741679--Pax Chirag Shah--Due ***ASAP***

My suggested revision is included in the attached; it references "safety-related issues".

(See attached file: 213660741679--Shah denied boarding due to strange behavior discrim.docx) William F. Ranieri

USAIG UNITED STATES AIRCRAFT INSURANCE GROUP

AMERICA'S FIRST NAME IN AVIATION INSURANCE _____

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917.669.9875 MOBILE | 212.349.8226 FAX | 212.859.3830 CLAIMS FAX | wranieri@usau.com | usaig.com

USAIG is managed by United States Aviation Underwriters, Inc.

From: Mary Mortensen <Mary.Mortensen@wnco.com>
To: "william.ranieri@usaig.com" <william.ranieri@usaig.com>,
"sherry.ortiz@usaig.com" <sherry.ortiz@usaig.com>,
Date: 05/16/2013 12:50 PM
Subject:FW: CR SR 213660741679--Pax Chirag Shah--Due ***ASAP***

Bill or Sherry, Elizabeth needs a quick turnaround regarding the above.

Mary Mortensen
Senior Supervisor
Customer Claims Administration
Southwest Airlines Co.
P O Box 36611
Dallas, TX 75235
214-792-4387
214-932-1333 (f)
www.cca@wnco.com

From: Elizabeth Behrens
Sent: Thursday, May 16, 2013 11:35 AM
To: Mary Mortensen
Subject: CR SR 213660741679--Pax Chirag Shah--Due ***ASAP***

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From: Elizabeth Behrens
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To: Mary Mortensen
Subject: RE: FW: CR SR 213660741679--Pax Chirag Shah--Due ***ASAP***

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You are the BEST! Thank you, thank you, thank you!
:)

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917.669.9875 MOBILE | 212.349.8226 FAX | 212.859.3830 CLAIMS FAX | wranieri@usau.com | usaig.com

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To: "william.ranieri@usaig.com" <william.ranieri@usaig.com>,
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Stern, Jonathan M.

From: Bult, Teresa <TBult@constangy.com>
Sent: Monday, December 02, 2013 5:46 PM
To: Stacy Cozad
Cc: Knight, Maureen
Subject: Virginia passenger discrimination case

Follow Up Flag: Follow up
Flag Status: Flagged

Hey, Stacy - not sure if this is in your area of supervision or not, but here it is. Let us know if you need help in any way. Am copying Maureen so she can be aware and available if you need her.

Chirag Shah
v.
Southwest Airlines, a Texas
corporation; Does
11/29/2013 1:13 cv 1481 AJT
(Alexandria)

Discrimination. Defendant Southwest Airlines pulled
plaintiff Shah, a U.S. Customs and Border Protection
contractor of South Asian decent, off its airplane based on
his appearance. Plaintiff seeks compensatory and punitive
damages to be determined at trial.

Thomas Breeden

[Download](#)

See you next week!
T

Teresa Rider Bult

Administrative Partner

Direct: 615.340.3801 • Direct Fax: 615.810.8062

E-mail: TBult@constangy.com • [View Bio/VCard](#)



401 Commerce Street, Suite 1010, SunTrust Plaza Nashville, TN 37219

Main: 615.320.5200 • Fax: 615.321.5891 • www.constangy.com

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Stern, Jonathan M.

From: Ruby Boykin <Ruby.Boykin@wnco.com>
Sent: Monday, April 15, 2013 9:12 PM
To: MRT; Fred Taylor
Cc: Mona Clark; Mike Hobbs; Bob Eastman; Ruby Boykin
Subject: Ground Ops MOM Irregularity Report

Sensitivity: Confidential

Follow Up Flag: Follow up
Flag Status: Flagged

Report Id: 148278
Name: Ruby Boykin
Title: Customer Service Supervisor
Aircraft Number: N758
Event City: IAD
Flight Number: WN392
Event Date 04/15/2013
Original City Pair IAD DEN
Event Time: 18:30
Report Date and Time: 04/15/2013 19:00

****MOM Questions****

Was an emergency declared? No
Did the majority of the Customers express concern about the flight? No
Did the Customers experience a highly unusual amount of inconvenience? No
Did the Customers display obvious physical or emotional discomfort? No
Do you feel a follow up message to the Customer is necessary? No
Is this an AirTran operated flight? No
Were you able to provide our Customers with an explanation about what occurred? No
Is this report for a disability-related incident AND have you completed the WN-314/WN-315? No
Was this flight an Ops Recovery (SWORD) Flight? No
Did you issue SLVs for the affected Customers? No
Did you reroute Customers? No
If SLVs were not provided, did you e-mail a specific list of affected Customers to the PCS Team-DG? No

****Events****

Unruly Customer

****Disruptions****

****Additional Events****

Event Summary (beginning to end):

I was asked to return to the gate because flight 392 was returning to the gate due to 2 unruly passengers. Shannon Ramos #46085 said Chirag Shah #GL7SLE would not buckle his seat belt and he had food in his lap after she made the announcement to prepare for take off, she also asked him a question and he did not answer it correctly. She also said Akilesh Muralidharan #GWK07Z kept looking at Chirag and he was also unruly. They were on row 1 on opposite sides of the aircraft.

Customers' Reaction:

They seemed confused and did not know why they were taken off the aircraft.

What type of local Customer Accommodations (if any) were provided?

NONE

How did your Team respond to this event?

They handled everything calmly. The two passengers were rebooked on flights tomorrow.

****Special Customer Forms ****

****Unaccompanied Minors****

****Medical Emergencies****

****Unruly Customers****

****Unruly Customer Contact Information****

PNR: GWK07Z
Name: Akilesh Muralidharan
Gender: M
Street: 14001 Westmeath Drive
City: Laurel
State: MD
Zip: 20707
Phone: 301-335-8877

Conversation: He said he did not do anything wrong he was just leaning back in his seat.

****Unruly Customer Contact Information****

PNR: GL7SLE
Name: Chirag Shah
Gender: M
Street: 3917 Beeker Mill Place
City: Chantilly
State: VA

Zip: 20151

Conversation: He said he did not do anything wrong, he was just looking out the window and he had food in his lap and a drink.

Stern, Jonathan M.

From: Request-For-Reports-SWA@SWA.COM
Sent: Tuesday, April 16, 2013 5:27 PM
To: Inflight Information Request PHX-DG; Steve Leatham; Lisa Daigle; Charlotte Whipple
Cc: Lauren Hufham; Debi Newman; Debbi.Tarkington@wnco.com; Nora Shafer; Mike Mankin; Kevin Allen; Maureen Emlet
Subject: Request for Reports SR #{213660741679} Due Date 4/26/13

Sensitivity: Confidential

Follow Up Flag: Follow up
Flag Status: Flagged



POSSIBLE
DISCIPLINARY ACTION REQUIRED
WHAT YOU NEED TO DO:

Please call ext. 6545 or e-mail lisa.keegan@wnco.com
TODAY to verify that you have received this e-mail.

The Customer's correspondence alleges inappropriate behavior of one or more of our Employees. We need your assistance in order to address this Customer's concerns and meet our regulatory and legal obligations. It is essential that Customer Advocacy, General Counsel, and other relevant departments have a full picture of the event, including a factual and detailed report from the Employee(s) involved. We will also need a summary from the Employee's Supervisor/Manager.

Please ensure the Supervisor/Manager answers the following questions:

1. What is the name and Employee number of the Employee(s) involved?
2. Is the Customer's description of the Employee's actions/behavior typical for this Employee?
3. Has the Employee(s) ever had a similar complaint (e.g., disability-related, discrimination, etc.)?

4. Has followup with the Employee occurred? If not, will it occur?

Please submit your report by replying to this e-mail

SWTLCRFR@wnco.com no later than: **4/26/13**

Customer Name: Chirag Shah

Confirmation #: GL7SLE

Flight #:392

Flight Date: 4/15/13

City Pairs: IAD/DEN

Crew List:

PHX Inflight Crew

FAA Q 09 46085 4394 RAMOS SHANNON

FAB A 01 46936 4518 ALLEY AVA

FAC A 01 17291 1450 PASCHALL REGINA

Copy of e-mail/letter or summary of complaint:

Hello,

I am 37yrs old man living with my wife and two little boys in fairfax, va area. I do IT consulting for US Federal agencies like CBP, IRS, USCIS etc.

I had a very DISTURBING AND HUMILIATING experience on SW flt #392 as I was escorted out by Police and not allowed to fly, FOR NO APPARENT REASON AT ALL. There was one more gentleman who was also NOT allowed to fly as well, though I do not know the person, but was of Indian descent like me.

I called into SW CSR today and explained the whole event and Susan - the rep on phone has opened a ticket 213659802352 to be escalated up the chain and get the flight report etc.

I am contacting you to ensure that you have this in writing from me as well. Here's what happened and is exactly what I told the TSA folks as well.

I boarded the flight to DEN around 5.50pm from IAD and found a seat in first row window towards the right side of plane. I put my laptop in the bin above and did not have space for my winter jacket which I kept in my lap. I had brought a Potbelly sandwich and Cream soda bottle as well, which I ate while the plane was still at gate. As the plane started taxing I was having causal conversation with gentleman right next to me. I am very fond of planes and

airports so I pretty much look out the window like a little kid and keep watching the line we had in front of us as we were taxiing. Though I did notice that the flight attendant with blonde short hair and wearing glasses was looking towards me. I kept looking back and forth outside the window and back to her as she was sort of continuing to stare at me for no reason. Anyways, the flight attendant did her PA and we were moving slowly. I made sure my belt was on. We came up right near the runway and I noticed the plane took a reverse turn instead of going to the runway. The pilot came on the PA and stated they were having couple of passenger issues and were taxiing back to the gate.

They come up to the gate, the police comes into the plane, looked around a little and then asked me to step out and another gentleman as well seated in the first aisle row on other side. The first thing the police asked me was whether I was being "difficult" with the staff? This shocked me as I had not had a single word with the flight attendant nor did I cause any scene anywhere. I asked the police to speak to the person sitting right next to me, though they stated that I will not be allowed to fly.

So please contact me and I want to escalate this higher up the chain.

Thx

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Southwest Airlines
2702 Love Field Drive
Dallas, TX 75235

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SR{213660741679}

Phone SR 213659802352—Customer Chirag Shah

Pax is upset that he was deboarded due to suspicious activity. Pax states he was just minding his own business and not one of the FA's ever spoke to him in regards to anything. Pax states when they started to take off the plane turned around and the pilot stated he had to go back because they were having some problems with a pax. Pax states the FA told police he was fidgeting. Pax wants a written reponse to this matter and all reports taken at the airport. Advised if he would like written report he would have to write in. Apologized for inconvenience advised I would doc complaint.

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Thx

Response Draft:

Thank you for taking the time to follow up with us regarding your recent experience as our Customer. I was saddened to learn that you were unable to travel as scheduled, and I appreciate this opportunity to respond to your concerns.

After we received your e-mail, we requested additional information from the Crew who worked Flight #392 on April 15 and the Washington (Dulles) Customer Service Supervisor with whom you interacted. Two of the Flight Attendants indicated that after observing your behavior during the preflight Safety briefing, they contacted the Captain who made the decision to return the aircraft to the gate. You were denied boarding on Flight #392 [due to safety-related issues](#) in accordance with our *Contract of Carriage*. Please know that your concerns have been shared with the appropriate Leaders for their review and internal followup. That being said, I assure you that Southwest does not condone discrimination or prejudice in any form. Indeed, we want and solicit business from anyone who is kind enough to give it to us.

Again, thank you for contacting us. We look forward to having an opportunity to serve you again soon. It is always our privilege to welcome you onboard.

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Schnader
ATTORNEYS AT LAW

750 9TH STREET, NW SUITE 550
WASHINGTON, DC 20001-4534
202.419.4200 FAX 202.419.3454 schnader.com

January 24, 2014

Metropolitan Washington Airports Authority
Police Department – MA-310R
Ronald Reagan Washington National Airport
Washington, DC 20001

Re: Date of Incident: April 15, 2013
Place of Incident: Washington Dulles International Airport
Time of Incident: Approximately 6:10pm

To Whom It May Concern:

Enclosed, please find a Report/Information Request Form to obtain a report on an incident that involved Southwest Flight 392 on April 15, 2013. We represent Southwest Airlines Co. in litigation arising from the removal of two passengers from the flight.

We understand that MWAA police officers reported to the gate. The litigation was filed in the Eastern District of Virginia by Chirag Shah.

Sincerely,



Leona Benn
Assistant to Jonathan M. Stern, Counsel
and Managing Attorney

Enclosure

METROPOLITAN WASHINGTON AIRPORTS AUTHORITY POLICE DEPARTMENT

Activity Reported Airline Incident R201300787

Suspect: Chirag R. Shah, 1283 West Larona Lane, Tempe, Az. 85284
Suspect: Akilesh Muralidharan, 2091A El Camino Real, Palo Alto, CA 94306
Complainant: George C. Cannon
Complainant: Regina Paschall
Complainant: Shannan Ramos
TSA Inspector: Ray A. Perry

On Monday April 15, 2013 at approximately 1827 hours, two officers were dispatched to gate B50 for the report of an upset passenger in the rear of a Southwest aircraft. The aircraft was reported returning to the gate.

Upon my arrival on scene, the officer met with South West Airlines flight crew members Ms. Shannon Ramos, and Ms. Regina Paschall. Ms. Paschall stated, "There are two male passengers onboard the aircraft who are acting suspiciously." The officer asked Ms. Paschall if she could elaborate on what she was referring to as suspicious and she stated, "Looking out the window, observing the surroundings, and reading the aircraft information pamphlet."

The officers escorted the two male passengers off the aircraft who Ms. Paschall and Ms. Ramos identified prior. One officer identified the passenger seated in 1F as Mr. Chirag Shah (VA operator's license), and the other officer identified the passenger seated in 1B as Mr. Akilesh Muralidharan (CA operator's license). A VCIN/NCIC and criminal history check was conducted on both Mr. Shah and Mr. Muralidharan, with negative results.

Upon speaking with Mr. Shah he informed the officer that he did not have any idea what was occurring. Mr. Shah stated that he was looking out the window and around the aircraft because he likes planes and wanted to see why there was a delay on the taxi way. Mr. Shah went on to state that he did not have any contact with either flight crew member while onboard the aircraft.

Mr. Muralidharan explained to the officer that he was asked several times to buckle his seat belt, and eventually complied upon instruction.

Mr. Shah and Mr. Muralidharan stated that they are not

acquaintances and have never had prior contact with one another.

A TSA Inspector was on scene and interviewed Mr. Shah and Mr. Muralidharan.

The Captain of the flight, in addition to his flight crew, agreed to have Mr. Shah and Mr. Muralidharan removed from flight 392 to Denver Colorado.

Mr. Shah and Mr. Muralidharan were rebooked by South West Airline customer service for a future flight.

Based upon the officer's interviews with Mr. Shah and Mr. Muralidharan, no criminal intent existed.

No charges were placed, nothing further at this time.

Date of Occurrence: 04/14/2013

General Location of Incident: Dulles International Airport, 44815 Bravo Rd, Gate B50, Dulles, Va. 20166

Investigating Officer: Ofc. T. White, A552

Transported? Yes No ☒

Property Damaged/Stolen (General Description):

Note: The foregoing criminal incident information is provided as required by the Virginia Freedom of Information Act. Additional information may be, but is not required to be, provided at the discretion of the Police Department.

For information contact Police Records at 703-417-8520.

METROPOLITAN WASHINGTON
AIRPORTS AUTHORITY

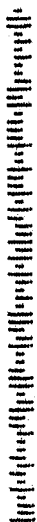


Ronald Reagan Washington National Airport
Washington, DC 20001-4901



Schnader Attorneys at Law
Attn: Mr. Jonathan Stern
750 9th Street, NW Suite 550
Washington, DC 20001-4534

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